

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

AMERICAN INSURANCE COMPANY, a)
Nebraska corporation,)

Plaintiff,

V.

ST. JUDE MEDICAL, INC., a Minnesota corporation,

Defendant.

Court File No. 08-013 (DSD/JJG)

ST. JUDE MEDICAL, INC.'S MOTION TO ADD PARTY

Defendant, St. Jude Medical, Inc., hereby moves this Court pursuant to Federal Rules of Civil Procedure 19, 20, and 21 to add Willis of Minnesota, Inc., formerly known as Willis Corroon Corporation of Minnesota (“Willis”), as a defendant in the above-captioned matter, whereupon St. Jude Medical, Inc., would file the attached Answer, Counterclaims, and Cross-Claims against Willis. This motion is based on the entire file in this case, the legal memoranda and affidavits to be submitted in support of this motion, and the arguments of counsel.

DATED: September 22, 2008.

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